



# SHELL OIL COMPANY

P. O. BOX 262  
WOOD RIVER, ILLINOIS 62095

August 15, 1979

5241  
RECEIVED

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E.P.A. - D.L.P.C.  
STATE OF ILLINOIS

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Illinois Environmental Protection Agency  
Division of Land/Noise Pollution Control  
2200 Churchill Road  
Springfield, Illinois 62706

Attention Mr. John S. Moore

Gentlemen:

We submit herewith five copies of our Petition for Variance from Rule 501 of Chapter IX, Part V, of the Illinois Pollution Control Board Rules and Regulations. Specifically we request a variance from Rule 501 insofar as it applies to shipments of special waste in our vehicles on public roads between various parts of our Wood River, Illinois petroleum refinery.

If you require any further information, please contact Mr. John F. Cole at 618-254-7371.

Very truly yours,

A. R. Williams  
Refinery Manager

Enclosures

cc: Illinois Pollution Control Board  
Attention Ms. Christan L. Moffett, Clerk  
309 West Washington Street, Suite 300  
Chicago, Illinois 60606

10 Copies - Petition for Variance - Certified Mail  
Return Receipt Requested - Enclosure



BEFORE THE POLLUTION CONTROL BOARD  
OF THE STATE OF ILLINOIS

SHELL OIL COMPANY,	)	
	)	
Petitioner,	)	
	)	
vs.	)	PCB
	)	
ENVIRONMENTAL PROTECTION	)	
AGENCY,	)	
	)	
Respondent.	)	

PETITION FOR VARIANCE

NOW COMES Shell Oil Company ("Petitioner") and files this its Petition for Variance from Rule 501 of Chapter IX, Part V of the Illinois Pollution Control Board Rules and Regulations. Specifically, Petitioner owns and operates a large integrated petroleum refinery at Wood River, Illinois. The relief sought by Petitioner is a variance, pursuant to Title IX, Sections 35-38 of the Illinois Environmental Protection Act, from compliance with the special waste manifest requirements of Rule 501 for shipments of special waste on public roads between contiguous and non-contiguous parts of Petitioner's refinery property. In support of this Petition, Petitioner alleges and states as follows:

1. Petitioner owns and operates a petroleum refinery on a 2020 acre site in Wood River Township, Madison County, Illinois. The nominal crude oil processing capacity is 295,000 barrels per operating day. Crude oil is supplied from fields in various states, including Louisiana, Mississippi, Oklahoma, Texas and New Mexico, as well as Middle Eastern and other foreign countries. Refined products are principally propane, motor gasolines, aviation fuels, diesel and heating oils, lubricating oils, heavy fuel oil and asphalt. Petitioner's Wood River Refinery is the largest petroleum refinery in Illinois

and supplies approximately 12 percent of the refined petroleum products consumed in the State. Other states supplied by the Refinery include Missouri, Indiana, Ohio, Kentucky, Iowa, Michigan, Wisconsin and Minnesota. There are approximately 1,700 persons employed at the refinery.

2. Petitioner's refinery comprises approximately 2020 acres of contiguous and non-contiguous property (see Exhibit A). For example, Petitioner's docks on the Mississippi River are located approximately one mile from the main refinery property, its waste water treatment plant and sulfur recovery facilities are separated from the main refinery property by public roads, and likewise Petitioner's crude oil tank farm is separated from the main property by public roads.

✓3. In the normal course of Petitioner's business it is necessary to move material on the public roads between these various properties, including materials that probably fall under the definition of "special waste" pursuant to the Board's new Chapter IX Regulations. This special waste comprises waste normally found in the petroleum refining industry, e.g. sour water, slop oil, oily sludge, tank bottoms, caustic and acid sump pumpings, etc. Much of this "waste" is recovered and/or treated before disposal. The waste is hauled between the various parts of Petitioner's property in a fleet of nine vehicles, including tank trucks, vacuum trucks, and dump trucks. On July 17, 1979, Petitioner applied to the Illinois Environmental Protection Agency for special waste hauling permits pursuant to Rule 201.

4. According to Rule 501 each person who delivers special waste to a permitted special waste hauler shall complete a manifest to accompany the special waste from delivery to the destination of the special waste. In this case, Petitioner is the generator, hauler and disposer of the special waste, and therefore Petitioner must prepare and handle the six-part manifest

for each load of special waste. Petitioner's records show that it hauls between one and two thousand truck loads of special waste between its properties each year. Petitioner feels that filling out and handling a six-part manifest for each load of waste would be an arbitrary and unreasonable hardship both on Petitioner and on the Agency. Petitioner does not seek this variance for shipments of special waste from its refinery to other locations, but only for shipments between the various parts of its refinery.

5. The purpose of the Illinois special waste hauling regulations is to track waste to ensure that it is properly disposed of. This requirement is met by Petitioner's own internal waste disposal procedures, including a permit system (see Exhibit B) that tracks each load of waste in Petitioner's refinery regardless of whether or not the waste is special. Petitioner's waste disposal procedures and permit system are equivalent to and meet the intent of the manifest system. Petitioner's waste disposal records and procedures are available for inspection by the Agency at any time.

6. Petitioner believes that having to comply with Rule 501 is an arbitrary and unreasonable hardship in the form of increased and inflationary administrative costs both on it and the Agency. Petitioner is however convinced that this particular added paperwork burden will contribute absolutely nothing to the protection of the environment.

Additionally, the Illinois special waste hauling regulations conflict with the proposed regulations of the U.S. Environmental Protection Agency pursuant to RCRA (Federal Register December 18, 1978, at page 58946) and Department of Transportation Regulations (Federal Register May 25, 1978, Section 171.3 (a)(e)), which are applicable to intrastate and interstate transportation of hazardous waste. When such Federal regulations are

finalized, Illinois regulations will have to be amended to provide consistency.

In accordance with Title IX, Section 35 of the Act, Petitioner asks that it be granted a variance from Rule 501, Chapter IX, Part V of the Illinois Pollution Control Board Rules and Regulations insofar as it relates to shipments of special waste in Petitioner's vehicles on public roads between various parts of Petitioner's Wood River, Illinois, petroleum refinery.

Petitioner requests a hearing on this Petition.

Respectfully submitted,

SHELL OIL COMPANY

By:



A. R. Williams, Refinery Manager  
Shell Oil Company  
P.O. Box 262  
Wood River, Illinois 62095  
(618) 254-7371

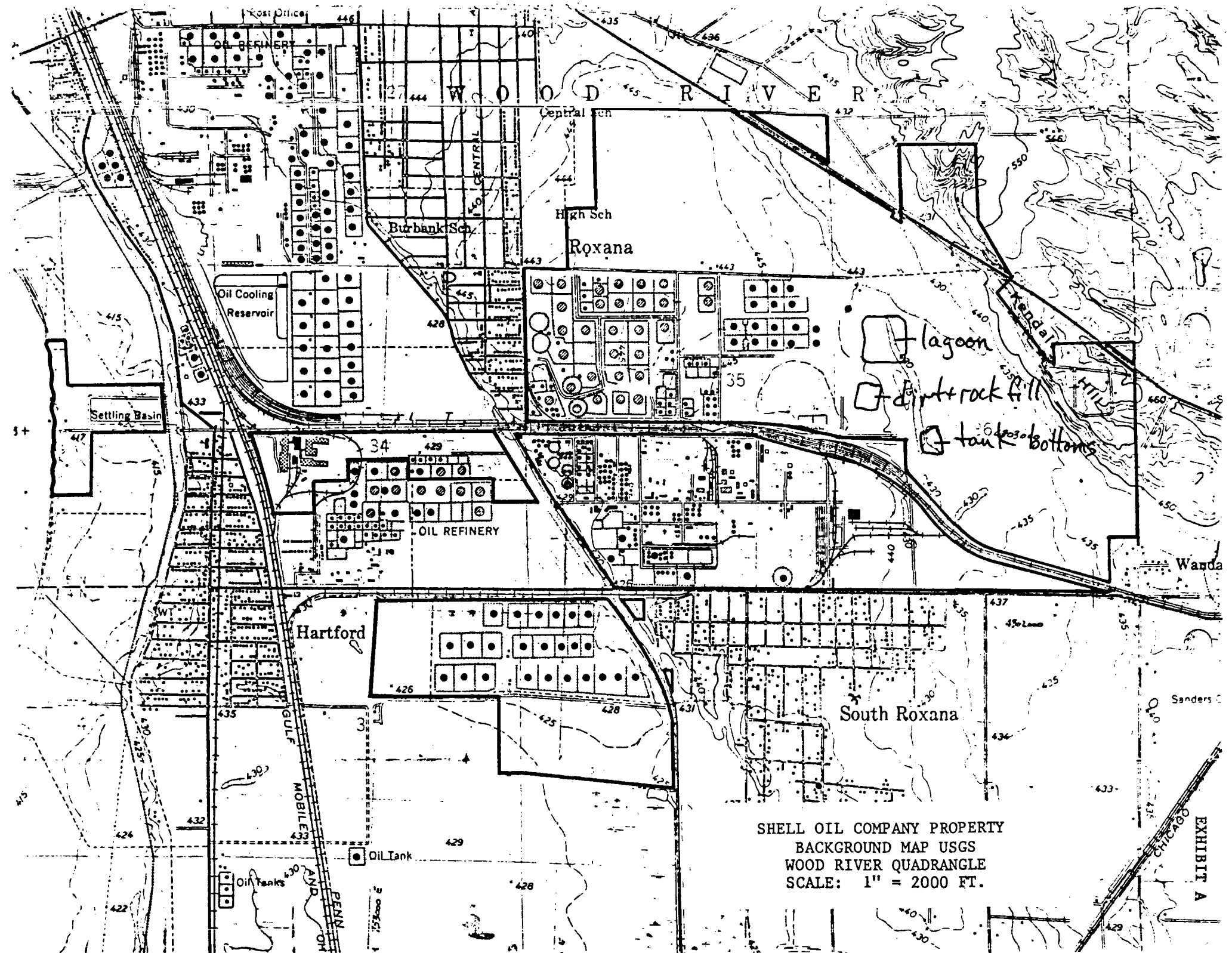


EXHIBIT A

00979

**SHELL OIL COMPANY**  
**WOOD RIVER REFINERY**  
**WASTE DISPOSAL PERMIT**

DO NOT ISSUE THIS PERMIT UNLESS YOU ARE SATISFIED THAT THE  
WASTE PRODUCT CAN BE HANDLED AND DISPOSED OF IN A SAFE  
AND ENVIRONMENTALLY SOUND WAY.

UNIT \_\_\_\_\_ DATE \_\_\_\_\_

THIS AUTHORIZES \_\_\_\_\_  
TO HAUL WASTE MATERIALS SUBJECT TO CONDITIONS SPECIFIED.

MATERIAL \_\_\_\_\_

SOURCE:

Tank No. \_\_\_\_\_ Vessel No. \_\_\_\_\_ Sump No. \_\_\_\_\_  
Process Unit \_\_\_\_\_ Type Equipment \_\_\_\_\_

OTHER \_\_\_\_\_

SPECIAL PRECAUTIONS \_\_\_\_\_

Estimated Quantity \_\_\_\_\_ BBLS. \_\_\_\_\_ Pounds \_\_\_\_\_ Tons \_\_\_\_\_

Analysis: Ph \_\_\_\_\_ Phenol Content \_\_\_\_\_ CN \_\_\_\_\_  
Sulfide Content \_\_\_\_\_ Mercaptan Content \_\_\_\_\_  
Oil Content \_\_\_\_\_ B.S. & W. \_\_\_\_\_  
IBP \_\_\_\_\_ Heavy Metals \_\_\_\_\_  
Special \_\_\_\_\_

DISPOSAL SITE \_\_\_\_\_ TIME \_\_\_\_\_

PERMIT ISSUED BY \_\_\_\_\_ TIME \_\_\_\_\_

WASTE HAULED BY \_\_\_\_\_ TIME \_\_\_\_\_

RECEIVED BY \_\_\_\_\_ TIME \_\_\_\_\_

APPROVAL NO. \_\_\_\_\_ ISSUED BY \_\_\_\_\_ FOREMAN \_\_\_\_\_

CALL UTILITY CONTROL CENTER  
PHONE 408 or 822 FOR APPROVAL NUMBER

YELLOW-UTILITIES WHITE-DRIVER GREEN-Q.C. PINK-ORIGINATOR